REMARKS/ARGUMENTS

The FINAL Office Action of 01/22/07 has been carefully reviewed and these remarks are responsive thereto. Claims 1-41, 43 and 67 have been canceled. Claims 42, 44-46, 48-49, 58, 65-66 and 72 have been amended. Applicants have amended independent claim 42 to contain the elements of claim 43 and amended claim 66 to contain the elements of claim 67 to place them in better form for reconsideration or appeal. Claims 42, 44-66, and 68-76 are pending. Claims 44, 45, 46 and 48 have been placed in independent form and in better form for reconsideration or for appeal. Claims 43 and 67 are cancelled. As will be explained below, claims 42, 44, 45, 58 and 72 have been amended to clarify "according to a time constant" per the specification support at p. 48. No new matter has been added. Reconsideration and allowance of the instant application are respectfully requested. This response to the FINAL Office Action of 01/22/07 should raise no new issues as to at least amended claims 46 and 48 and their respective dependent claims. Claims 46 and 48 have only been placed in independent form and have not been otherwise amended.

Generally, the amendments made herein merely incorporate claim limitations from previously examined claims into other previously examined claims and clarify the claim language. Consequently, the Examiner has already indicated her reasons for rejection of each of the present independent claims, and applicants respectfully request reconsideration and allowance due at least to the Examiner's failure to present a prima facie case of obviousness of claims 46 and 48 as will be discussed further below.

Additionally, claim 72 has been amended to incorporate limitations from dependent claims 43 and 67, now cancelled. Consequently, claim 72 should raise no new issues because the examiner has considered the limitations of claim 72 before, just not in the combination and with interrelationships of recited elements as claim 72 has been amended to contain. Altogether, there are seven independent claims: 42, 44, 45, 46, 48, 66 and 72 pending in the present application. Each will be discussed in turn below.

Dependent claim 49 has been amended to strike a redundant limitation. Claim 58 has been amended to correct its dependency to claim 46 and to correct "according to a time constant"

to be consistent with the specification. Claim 65 has been amended to be consistent with the specification as described per Example 4, page 20-23.

Applicants reserve their right to continue prosecution of claims rejected responsive to the first Office Action issued July 26, 2006 and cancelled in any amendment in this application in a continuation application as applicants continue to traverse the rejections made in the first Office Action. Applicants respectfully request an opportunity to interview this application.

The Rejection of Claims 42-74 Under 35 U.S.C. §103(a)

Claims 42-74 are rejected as unpatentable over Merkey (U.S. 6,728,959 B1) in view of Kitain et al. (U.S. 5,864,871). The rejection is respectfully traversed.

To reject a claim as *prima facie* obvious three criteria must be met:

> First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.

MPEP § 2142. The rejection of the present claim set fails to meet at least the first and third criteria with respect to the amended independent claims 42 (now incorporating the limitations of claim 43 and so will be considered from the standpoint of the rejection of claim 43); claims 44, 45, 46 and 48 (as amended to be presented in independent form); claim 66 (now incorporating the limitations of claim 67 and so will be considered from the standpoint of the rejection of claim 67) and claim 72 (now incorporating limitations from claims 43 and 67) as amended.

The Examiner asserts applicant's arguments have been considered but are not persuasive because "Merkey teaches the list of available processors in column 11 lines 29-67 and column 12 lines 1-9 where it discloses how the a list is maintained of the available processors and they way the load of the processors is balanced. Furthermore, Figure 9 illustrates list of processors that are available and busy. Claim 66 and 72 recite the same subject matter and for the same reasons as cited above the rejection is maintained."

Applicants disagree. The examiner's comments fail to take into consideration the entirety of the claims as originally presented, the remarks made by applicants and the amendments made to the claims in response to the first Office Action of July 26, 2006. Perhaps most importantly, the Examiner paraphrases claim 42 and so fails to indicate at page 3 or 4 of the Final Office Action where in Merkey there is shown at least "a communication system . . . wherein at least two host processors communicate capacity and load information to other host processors" and plural processor memories maintaining capacity and load for each processor as recited. The Examiner at page 4, line 3-6 conveniently fails to discuss these limitation. In fact, Merkey teaches: "only the processor in question" (col. 6, ll. 25-28) – "only by the local scheduler for the processor in question," (col. 12, ll. 59-61) and local queues for local threads 64.

Applicants wish to direct the Examiner's attention to at least page 48, ll. 7-18 where support may by found for "according to a time constant" of claims original claims 43, 58 and 66. As is clear from the specification, at page 48, the time constant relates to load balancing and not broadcasting. Applicants apologize for the error in the original claims and have made the clarification as appropriate in all impacted claims.

The rejection of each independent claim will now be discussed and a demonstration made that the rejection of each independent claim as amended is not well-founded.

Claim 42 as amended to incorporate claim 43

The rejection of claim 42 will be considered from the viewpoint of the examiner's rejection of claim 43 whose limitations have been incorporated by this amendment into claim 42. But first, original claim 42 will be discussed for the capacity/load distinction but more importantly for Merkey's failure to teach plural processors communicating with plural processors as recited – i.e. the originally recited communication system and each processor maintaining information about the capacity and load for each available host processor in memory. The Examiner does not speak to these limitations and, consequently, it is urged that the FINAL Office Action of January 22, 2007 does not present a prima facie case of obviousness or anticipation.

The Examiner in regard to claim 42 states that the limitations of the claims are found in Merkey, Figures 7 and 8: "host and root host processors maintaining a list of available host processors and information about the capacity and load for each available host processor in memory." Office Action at page 4, lines 1-3. Applicants disagree.

Merkey searches thread queues rather than having a "search queue" as recited. There are three types of thread queues in Merkey: the global dispatch queue, the unlocked local queue and the lockable local queue (which is optional), none of these being a "search queue" as recited. A "processor in question" has exclusive control over the unlocked local queue, which therefore does not need a mutex and can move threads from the unlocked local queue to the global dispatch queue. Another processor or the "processor in question" may then select and move one of the threads from the global dispatch queue. The local thread queue is just that – a local thread queue for a given processor; a Merkey "processor in question" looks to the global search queue 68 first as will be explained below. Merkey has no "search queue" as recited.

The recited "communications system" is allegedly shown in Figure 9. The examiner admits that Merkey does not disclose "the search, storage and retrieval of data and the database index" as claimed. With respect to claim 43, now combined with claim 42, the Examiner relies on Kitain, column 6 lines 24-27 and Merkey Figure 7 and column 9 lines 30-40. Applicants cannot agree that these references disclose or suggest applicants' claim 42 as amended.

Merkey shows in Figure 9: "place all processors on candidate list," step 100, "remove processors with too few eligible threads," step 102, "any processors left?," step 104; "identify busiest remaining processor," step 108 and so on. Applicants previously urged a difference between load and capacity in distinguishing claim 42 over Merkey, but there is more recited in either the original or amended independent claim 42 than a distinction between load and capacity. Merkey, column, 9 lines 31-40 teaches "load indicator 86" for "available processing capacity" that is maintained in processors P1 through Pn. Thus, Merkey confuses the terms load and capacity. Original and amended claim 42 recites that both load and capacity are broadcast by at least two processors to another processor and maintained for all processors at each

processor (not suggested or described by Merkey's "global thread queue control structure 67" shared by all processors).

Merkey teaches thread count as a measure of load/capacity. "Thread count for each processor is maintained," column 12, lines 16-26. See also Figure 10 and, at column 12, lines 26-39, there is a discussion of two seconds large time quantum and small time quantum. Step 114 is a regular checking for movable threads 66 in an unlocked local queue 64 performed at every "large time quantum." See Merkey, col. 12, ll. 16-64 wherein it is described how a processor is allocated to a thread *as opposed to plural processors communicating load and capacity information to other processors and maintaining capacity and load for each available processor in memory as recited* (our emphasis added), i.e. "No mutex is needed for the unlocked local queues 64 because they are only accessed by the local scheduler for the processor in question" (Merkey, col. 12, ll. 59-61). Simply stated, Merkey gathers at a central site, queue control structure 67 in global dispatch queue 67. To the contrary, original claim 42's communication system and processor memory limitations call for communication by plural processors to other processors and having processor memory of load and capacity for other processors (not just for its own thread queue), not shown by Merkey. Merkey teaches away from maintaining other than local information at local queue 64 – a processor in question looks first to global dispatch queue 67 and then to other local queues 64 to move a thread to the global dispatch queue (Merkey, col. 11, ll. 13-20). So Merkey fails to teach at least the original communication system and processor memories of claim 42. All the independent claims have the advantage that a given processor may independently utilize load/capacity information stored in its memory without regard to other processor activity.

As earlier urged, Merkey appears to teach a load indicator that "provides a measure indicating how much of the available processing capacity is being spent running code in application threads…." Merkey at col. 9, lines 36-38. Merkey does not appear to teach maintaining information about processor capacity as defined in the art at each processor as recited. "Processing capacity", as defined by Microsoft Press *Computer Dictionary*, is "the maximum number of operations that a processor can handle in a given unit of time." See Exhibit

1 at page 54, lines 28-30, left hand column. It appears that Merkey's load indicator (threads) may provide the proportion of processing capacity of a processor that is currently in use, not the capacity of a processor as is known in the art, or "the maximum number of operations that a processor can handle in a given unit of time." Claim 42 recites "each (of plural processors) maintaining a list of available host processors and information about the capacity and load for each available host processor." Merkey teaches one centralized list 68 and local thread queues 64 for a given processor and so no communication system or processor memories as recited requiring multiple processors communicating the load and capacity to other processors and multiple storage of capacity and load information.

Moreover, Merkey teaches a load indicator "which indicates how heavily the **corresponding processor** is loaded." Merkey at col. 9, lines 34-35 (emphasis added). It appears as if Merkey's load indicator only maintains information indicating "how heavily the corresponding processor is loaded" at local queue 64, not *each* available processor, as recited in claim 42 as amended – i.e. plural processors. As mentioned above, claim 42 recites "each of said host and root host processors maintaining a list of available host processors and information about the capacity and load for each available host processor." This feature is not taught by Merkey.

Claim 42 and 43 when read together require at least two host processors having a search engine and maintaining information of a search queue, that selected host processors store a database index in memory comprising nodes and data accessible via said nodes and that at least two host processors bring their search queues into balance with another host processor in response to receipt of broadcast capacity and load information according to a time constant. Merkey teaches no "search queue" as recited. To the contrary, Merkey centralizes operations at a "processor in question" corresponding first with a global dispatch queue control structure 67, for example, as shown in Figure 6 (col. 9, line 1). But according to claim 42 as originally presented, at least two processors communicate capacity and load to another processor, not one processor in question maintaining the load information for itself and looking to a central structure 67 first and then to other local queues. Merkey does not teach communicating to others

and maintaining lists of processor load for other processors. Thus, Merkey fails to teach the communication system and memory limitations as recited whereby claim 42 as originally presented requires "at least two host processors communicate capacity and load information to other host processors" where each processor maintains load and capacity of others. To the contrary, there is a centralized queue structure 67 and the "processor in question" gathers thread count from others after checking the central queue 67 – not plural processors broadcasting to others as recited: "Threads are moved to a different processor only after being moved from an unlocked local queue into the global dispatch queue and thence to another processor" (Merkey, col. 14, ll. 20-29).

Moreover, the Examiner admits that Merkey does not disclose "the search, storage and retrieval of data and the database index as claimed" by original claim 43 and so relies on Kitain.

At most, Kitain appears to disclose a web server 4 coupled to at least two database servers of a central server 2 and a further central site 1 (Figure 1). Kitain fails to teach or suggest "a communication system coupling said host and root host processors," as recited. Even if combined, the alleged combination of Merkey and Kitain would not teach or suggest the features of independent claim 42 as amended to incorporate the limitations of claim 43. Kitain does not make up for the two processor broadcast or memory deficiencies of Merkey (Merkey teaching only one "processor in question" trying to move a thread via thread count) because Kitain, also has operations centralized at one of central site 1, central server 2 or web server 4 of Figure 1. Kitain also fails to teach two processors communicating to other processors as recited or memories as recited. Moreover, there is no suggestion to combine Kitain with Merkey because, like Merkey, Kitain operates from a single central site (Figure 1) while the invention as claimed relates to multiple processor communication and storage of load and capacity.

In fact, Kitain cannot be combined with Merkey because Kitain teaches away from Merkey at column 16, lines 44-47 where Kitain's "CGI practices semi-random selection of servers in an effort to balance the load on servers. This means that the order that servers are tried is not always the same." To the contrary, claim 42 as amended requires "bringing its search queue into balance with another host processor in response to receipt of said broadcast capacity

and load information according to a time constant." Merkey as urged above teaches a quantum of time but fails to teach any kind of search queue balance according to a time constant (and the examiner appears to admit Merkey's failure to teach or suggest a search engine). One would not look to Kitain for the answer to a problem of search queue balance not even presented in Merkey. Moreover, Kitain says nothing about broadcasting according to a time constant and so would not be combinable with Merkey.

In summary, then, Merkey and Kitain even if combined fail to teach at least the limitations of claim 42 as amended requiring two host processors bringing into balance their search queues in response to broadcast capacity and load information by at least two processors to other processors according to a time constant and memories maintaining other processor capacity and load information. Moreover, one would not be motivated to combine Kitain, for "search queue" and "database index" limitations of claim 42, and Merkey because they teach away from one another. The examiner speaks to motivation at page 4 in terms of providing an efficient search engine. But Merkey is not a search engine and so the examiner is using improper hindsight by referring only to Kitain as being efficient but not demonstrating any need in Merkey for Kitain's teachings or discussing the problems raised in trying to combine the teachings of Merkey and Kitain operating from differing principles: checking thread count every time constant (Merkey) and semi-random selection of a first processor and then a second and so on for a query (Kitain, col. 16, ll. 29-47). The examiner having failed to make a prima facie case of obviousness is respectfully requested to reconsider claim 43 and allow claim 42 as amended.

Claim 44 (amended to be in independent form)

Claim 44, now in independent form, depended from claim 43 which depended from claim 42. Consequently, the examiner's rejection of claims 42, 43 and 44 will be considered and are respectfully traversed for all the reasons above with respect to claims 42 and 43 and now with respect to claim 44. The Examiner relies on Merkey's Figure 6 depiction of a plurality of processors and a global thread queue control structure 67 and its global dispatch queue 68 in combination with Kitain's col. 6, lines 24-27 to reject claim 44. This rejection is traversed. Rewritten in independent form, claim 44 is allowable for all the same reasons as presented above

with respect to claim 42 as amended and urged above to incorporate the limitations of claim 43. Claim 44 further recites that there are three (or more) host processors, of which two have search engines and maintain information of a search queue and the third comprises the root host processor. Admittedly Merkey shows processors P1 to Pn. However, the examiner admits that Merkey does not disclose search, storage and retrieval of data and the database index in memory comprising nodes and data accessible via said nodes. The Examiner has rejected claim 44 by reading in an alleged suggestion of Kitain or Merkey that two host Merkey processors have search, storage and retrieval from column 6, lines 24-27 and then refers to Merkey for the third processor comprising the root host processor as per Figure 6. This reading in is improper hindsight.

Firstly, while Kitain shows "at least two database search engines" at column 6, lines 12-27, there is no suggestion raised by the examiner that one would be motivated to magically create Merkey's processors P1 to Pn of Figure 6 to include two with search engines maintaining search queues that are balanced on receipt of capacity and load information in accordance with a time constant as recited. Moreover, there is no suggestion in Kitain to designate one processor of Merkey as a root host processor. The Examiner uses improper hindsight to simply designate one processor, other than two with search engines, as a root host. So, for at least these additional reasons, claim 44 patentably distinguishes over Kitain or Merkey or their unmotivated combination.

Claim 45 (amended to be in independent form)

Claim 45 is allowable for all the reasons that claim 42 as amended is allowable because it depended originally on claim 43 which depended on claim 42. Claim 45 is a slightly different twist in designating processors. The examiner rejects claim 45 relying on Merkey Figure 6 in combination with Kitain. As already explained, Merkey's global queue control structure 67 and global dispatch queue 68 is associated with all processors, P1-P4 according to Figure 6 and depends on a "processor in question". Now, according to claim 45 as amended to read in independent form, the recited plurality of host processors comprises two host processors, of which one comprises the root host processor and both the processors have search engines and

maintain information of a search queue balanced as recited in former claims 42 and 43. As with claim 44, the Examiner cannot find a suggestion to convert certain of Merkey's processors P1 to Pn into processors with search engines, one of which is the root host, nor does Merkey teach a search engine or search queue. Kitain, for example, teaches away from this because no candidate central site 1, 2 or 4 (Figure 1) is designated as a root host, neither is one of DB servers 11 or 13 of server 2 so indicated. As explained previously, an active processor tries one processor at a time in Kitain (Kitain, col. 16, ll. 29-47). So, for at least these additional reasons, claim 45 patentably distinguishes over Kitain or Merkey or their unmotivated combination.

Claim 46 (amended to be in independent form)

Claim 46 is allowable for all the reasons that claim 42 as amended is allowable in its original form because it depended originally on claim 42. Merkey fails to teach, for example, the recited processor memory and communication system elements, the limitations of search, storage and retrieval and database index and so on as admitted are missing by the examiner and the failure to meet the communication system limitation of each of said at least two processors broadcasting capacity and load to other host processors for storage in processor memory. Original claim 46 contains yet a slightly different twist. Claim 46 requires a root host responsive to a client query and using an initial search queue. Read in the context of claim 42, now incorporated into claim 46, there is required a root host processor that maintains a list of available hosts and information about capacity and load; two host processors communicating capacity and load to other host processors and including an initial search queue limitation that cannot possibly be met without bringing Kitain into the equation. The examiner rejects claim 46 based on Kitain's allegedly teaching root processor initial search queue limitation per Figure 4 and column 11, lines 42-53. As already explained, there is no suggestion to magically designate a processor in Merkey (or Kitain) as a root host processor per Figure 6 or to suggest that such a root host processor so magically designated is responsive to a client query and uses an initial search queue. Kitain admittedly discloses DB servers 11 and 13 of a central repository 2, a web server 4 and a central site 1 per Figure 1. Figure 4 shows the word query 122 and a display screen Query Results. The referenced passage at column 11 of Kitain, rather than describing a

root host responsive to a client query, describes the network of Figure 1 wherein the central server 2 comprises servers 11 and 13 and does not describe a root host responsive to a client query and using an initial search queue. But as explained above, Kitain attempts to locate a new processor for a search query one at a time and so performs no communication system or processor memory as recited (Kitain, col. 16, ll. 29-47). The burden is on the Examiner to particularly describe where the limitation is shown or described. The examiner cannot simply suggest that because there exists a query per Figure 4 that there is a root host responsive to a query and using an initial search queue when neither Merkey or Kitain show the communication system or processors memories as recited, let alone, that a root host processor (one of a plurality of processors) is responsive to a client query and uses an initial search queue.

At column 16, lines 9-21 of Kitain, there is mention of two queries per a "report query form" of relational database 11 accessed by a common gateway interface (CGI) described at column 13 as an interface between the web server 4 program and other programs. This passage may comprise a suggestion of an initial query queue but certainly there is no communication system in Kitain as recited requiring plural host processor communication of capacity and load information to other processors for storage in their memory. For all these additional reasons, applicants urge that claim 46 as amended patentably distinguishes over Merkey/Kitain.

Claim 48 (amended to incorporate limitations from claim 42)

Claim 48 is allowable for all the reasons claim 42 is allowable and further incorporates the limitation the root host processor being responsive to a client query and selecting a host processor to receive search request information. Merkey alone cannot teach this limitation having no "search request information" only a thread search. Kitain has a search engine but no such limitation as recited. As urged in relation to claim 46, Merkey and Kitain even if combined fail to teach at least the limitation of original claim 42 "a communication system . . . wherein at least two host processors communicate capacity and load information to other host processors" and a memory at each processor maintaining a list of available processors and *information about capacity and load for each available host processor"* (emphasis added). Consequently, claim 48 is allowable over a Merkey/Kitain combination. Neither Kitain nor Merkey show this

communication system/memory feature. Kitain tries each processor to accept a query, and Merkey collects available thread count from many via structure 67 and maintains a local queue at each processor rather than broadcasting capacity and load from many to many and maintaining a memory at multiple processors about many as recited.

Claim 66 (amended to incorporate limitations of claim 67)

The examiner alleges at page 2 of the Final Office Action that claim 66 is so similar to claim 42 as to warrant no examination. At page 11 and 12 of the FINAL Office Action, the Examiner suggests that Merkey Figure 2 and 5 show a plurality of host processors comprising at least one root host responsive to a client query. Figure 2, in fact, shows P1 to P4 intercoupled to modules M1 to M4 via crossbar switch. Figure 5 shows P1 to P4 associated with structure 67 and global dispatch queue 68 with more threads 66 shown at local queue 64 for P4 than P1 – again Merkey using thread count as a measure of load/capacity at each processor. To the contrary, Merkey provides no discussion of a client query or "each host processor bringing its search queue into balance responsive to receipt of broadcast capacity and load information according to a time constant" as recited. Again, Merkey is concerned with a centralized thread queue 67, not a "search queue" as recited, and a "processor in question" checking the central queue and then local queues to find a processor thread. Claim 66 as amended further includes limitations from claim 67 that the balancing process involves "stochastic selection" to modify the step of bringing a search queue into balance (see support at least at page 48, ll. 7-18). Claim 66 as amended should raise no new issues by incorporating claim 67. Stochastic selection may be semi-random selection as broadly described by Kitain. But there is no suggestion to use stochastic selection in Merkey, or by Kitain to use stochastic selection in a non-search environment such as Merkey, to bring a search queue into balance according to a time constant as recited. The examiner cites to col. 16, lines 44-47 which use the words "semi-random selection of servers." Reading before those words at col. 16, we learn that the process of satisfying a "non-text matching query" will iteratively try one type of server, then another and so on until a server satisfies the query or all servers are found to be down. Merkey fails to provide any disclosure or suggestion of an "exchanged search request" as recited or "each host processor

bringing its search queue into balance . . . responsive to said broadcast capacity and load information according to a time constant." Kitain fails to make up for Merkey's deficiencies. For all these reasons, the Examiner has not made a prima facie case of obviousness of claim 66 as amended to incorporate the limitations of claim 67. Reconsideration and allowance of claim 66 as amended is respectfully requested.

Claim 72 (amended to incorporate limitations from claim 43)

Claim 72 stands rejected on the grounds that Merkey Figures 2, 5 and 9 show the recited elements along with the passage at column 9 lines 30-40. Kitain is added because the examiner admits that the search, storage and retrieval of data, database index, among other elements, are not shown by Merkey. The examiner points to column 6 lines 12-27 and column 16 lines 44-47. The examiner states at page 14 of the office action that a motivation for combining Kitain and Merkey is an efficient search engine. The examiner, using improper hindsight, suggests that this "efficient search engine being used to obtain the search results and allows more than one search to be conducted in parallel . . . Furthermore, with the global dispatch queue the load balancing of the processors would make the processing much more efficient." This is clear evidence that the examiner has reached an improper hindsight conclusion and of what combination? Claim 72 requires "at least two host processors . . . maintaining information on said plurality of said available host processors and on their capacity and load and information of a search queue" not taught be either Merkey or Kitain. The Examiner appears to be suggesting taking a thread control structure 67 and global dispatch queue 68 from Merkey Figure 5 and apply the thread queue structure 67 along with local queues 64 in Kitain Figure 1. The rejection is stated the other way around as Merkey in view of Kitain. Consequently, the Examiner has failed to suggest even the possibility of such a combination or how the elements of claim 72 as amended are found in Kitain as a primary reference. Even assuming the other way around, there is no search engine in Merkey and no "at least two processors" limitation as copied above. Applicants therefore respectfully submit the rejection of claim 72 is improper, and request that it be withdrawn. Again, neither Merkey nor Kitain teach the limitation of claim 72 as amended above or "each processor (comprising at least two) broadcasting its capacity and load information to

other host processors" or the newly recited addition "and bringing each search queue into balance . . . according to a time constant" when Kitain has only one search queue at a time.

The examiner fails to reject claims 75 or 76 except via a reference at page 4 of the Office Action which suggests that these claims are rejected under the same rationale given for claim 42 yet they contain new limitations shared memory and distributed memory among each processor. The Examiner has failed to indicate where in Merkey or Kitain these additional limitations are found. Moreover, applicants respectfully request reconsideration and allowance of all other remaining dependent claims not discussed above which add limitations to the current set of allowable independent claims.

CONCLUSION

All rejections of independent claims 42, 44, 45, 46, 48, 66 and 72 having been addressed, applicant respectfully submits that the instant application is in condition for allowance, and respectfully reconsideration of all pending claims and solicits prompt notification of the same. However, if for any reason the Examiner believes the application is not in condition for allowance or there are any questions, the Examiner is requested to contact the undersigned at (202) 824-3000. Applicants have not earlier requested an interview in this application. Applicants would appreciate the Examiner's contacting applicants' attorney at the number indicated below to schedule an interview to discuss the application before he issues a next office action.

Respectfully submitted,

POWELL GOLDSTEIN LLP

Dated this 20th day of March, 2007

By: /Thomas H. Jackson/
Thomas H. Jackson, Registration No. 29,808
901 New York Avenue, N.W.
Washington, D.C. 20001-4413
Tel: (202) 624-7325
Fax: (202) 624-7222

THJ/mmd